

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION

)
) MDL No. 2:18-mn-2873-RMG
)
)
)
)
)
)

This Document Relates to:
Case No. 2:18-CV-03487-RMG
Case No. 2:21-CV-01793-RMG

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, it is hereby stipulated and agreed between Plaintiff City of Stuart, Florida and all remaining Defendants who have appeared in these actions, respectively, that the parties have agreed to a dismissal with prejudice of all claims asserted by Plaintiff City of Stuart, Florida against Defendant Dynax Corporation only. With respect to the dismissal of Dynax, each side will bear its own attorneys' fees and costs.

Filed with the Consent of Co-Leads:

/s/ Michael A. London

Michael A. London
Douglas and London PC
59 Maiden Lane
6th Floor
New York, NY 10038
P: (212)-566-7500
F: (212)-566-7501
mlondon@douglasandlondon.com

/s/ Joseph G. Petrosinelli

Joseph G. Petrosinelli
Williams & Connolly LLP
725 Twelfth Street, N.W.
Washington, DC 20005
P: (202) 434-5547
F: (202) 434-5029
jpetrosinelli@wc.com

Paul J. Napoli
Napoli Shkolnik PLLC
1301 Avenue Of The Americas
10th Floor
New York, NY 10019
P: (212)-397-1000
F: (646)-843-7603
pnapoli@napolilaw.com

Scott Summy
Baron & Budd, P.C.
3102 Oak Lawn Avenue
Suite 1100
Dallas, TX 75219
P: (214)-521-3605
ssummy@baronbudd.com

Co-lead Counsel for Plaintiffs

Fred Thompson , III
Motley Rice LLC
28 Bridgeside Boulevard
Mt Pleasant, SC 29464
P: (843)-216-9000
F: (843)-216-9440
fthompson@motleyrice.com

Liaison Counsel for Plaintiffs

Michael A. Olsen
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
P: (312) 701-7120
F: (312) 706-8742
molsen@mayerbrown.com
Co-lead Counsel for Defendants

Brian Duffy
Duffy & Young LLC
96 Broad Street
Charleston, SC 29401
P: (843) 720-2044
F: (843) 720-2047
bduffy@duffyandyoung.com

David E. Dukes
Nelson Mullins Riley & Scarborough
LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
P: (803) 255-9451
F: (803) 256-7500
david.dukes@nelsonmullins.com

Co-liaison Counsel for Defendants

Stipulated to by the Parties:

This the 28th day of March 2023.

Respectfully Submitted,

By: /s/ Gary J. Douglas
Gary J. Douglas
Tate Kunkle
Rebecca Newman
Douglas and London PC
59 Maiden Lane, 6th Floor
New York, NY 10038
Telephone: 212-566-7500
Fax: 212-566-7501
gdouglas@douglasandlondon.com
tkunkle@douglasandlondon.com
rnewman@douglasandlondon.com

Wesley A Bowden
Levin Papantonio Rafferty
316 S Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: 850-435-7186
Fax: 850-436-6186
wbowden@levinlaw.com

Frank M. Petosa
Morgan & Morgan, P.A.
8151 Peters Road, 4th Floor
Plantation, FL 33324
Telephone: 954-327-3018
Fax: 954-327-3018
fpetosa@forthepeople.com

Robin L. Greenwald
Nancy M. Christensen
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Fax: 212-344-5461
rgreenwald@weitzlux.com
nchristensen@weitzlux.com

Attorneys for Plaintiff City of Stuart, Florida

By: /s/ Daniel L. Ring
Daniel L. Ring
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
P: (312) 701-7120
F: (312) 706-8742
dring@mayerbrown.com

Brian Duffy
Duffy & Young LLC
96 Broad Street
Charleston, SC 29401
P: (843) 720-2044
F: (843) 720-2047
bduffy@duffyandyoung.com

Counsel for Defendants 3M Company et al.

By: /s/ Joseph G. Petrosinelli
Joseph G. Petrosinelli
WILLIAMS & CONNOLLY LLP
680 Maine Avenue, S.W.
Washington, DC 20024
T: (202) 434-5547
F: (202) 434-5029
jpetrosinelli@wc.com

David E. Dukes
NELSON MULLINS RILEY &
SCARBOROUGH LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
P: (803) 255-9451
F: (803) 256-7500
david.dukes@nelsonmullins.com

*Counsel for Defendants Tyco Fire Products
LP & Chemguard, Inc.*

By: /s/ Jonathan I. Handler
Jonathan I. Handler
Keith H. Bensten
DAY PITNEY LLP
One Federal Street
Boston, Massachusetts 02110
T: (617) 345-4600
F: (617) 345-4745
jihandler@daypitney.com
kbensten@daypitney.com

John W. Cerreta
DAY PITNEY LLP
242 Trumbull Street
Hartford, Connecticut 06103
T: (860) 275-0665
F: (860) 881-2517
jcerreta@daypitney.com

Robert J. Giuffra, Jr.
William B. Monahan
Justin J. DeCamp
Nicole Friedlander
SULLIVAN & CROMWELL LLP

125 Broad Street
New York, NY 10004
T: (212) 558-4000
F: (212) 558-3588
giuffrar@sullcrom.com
monahanw@sullcrom.com
decampj@sullcrom.com
friedlandern@sullcrom.com

Judson O. Littleton
SULLIVAN & CROMWELL LLP
1700 New York Avenue, N.W., Suite 700
Washington, D.C. 20006-5215
T: (202) 956-7500
F: (202) 956-6330
littletonj@sullcrom.com

Counsel for Defendant Kidde-Fenwal, Inc.

By: /s/ Keith E. Smith
Keith E. Smith
Greenberg Traurig, LLP
1717 Arch Street, Suite 400
Philadelphia, PA 19103
P: (215) 988-7843
smithkei@gtlaw.com

Counsel for Defendant National Foam, Inc.

By: /s/ Brent Dwerlkotte
SHOOK, HARDY & BACON LLP
David R. Erickson
Brent Dwerlkotte
Jennifer E. Hackman
2555 Grand Boulevard
Kansas City, MO 64108
Telephone: (816) 474-6550
Facsimile: (816) 421-5547
derickson@shb.com
dbdwerlkotte@shb.com
jhackman@shb.com

HOOD LAW FIRM, LLC
Molly H. Craig (6671)
James B. Hood (9130)
Virginia Rogers Floyd (12212)

172 Meeting Street
Post Office Box 1508
Charleston, SC 29402
Phone: (843) 577-4435
Facsimile: (843) 722-1630
molly.craig@hoodlaw.com
james.hood@hoodlaw.com
virginia.floyd@hoodlaw.com

Counsel for Defendants E.I. Du Pont De Nemours and Company, The Chemours Company, and The Chemours Company FC, LLC

By: /s/ Addie K.S. Ries
Kirk G. Warner,
Clifton L. Brinson
Addie K.S. Ries
SMITH, ANDERSON, BLOUNT,
DORSETT,
MITCHELL & JERNIGAN, L.L.P.
Post Office Box 2611
Raleigh, North Carolina 27602-2611
Telephone: (919) 821-1220
Facsimile: (919) 821-6800
kwarnar@smithlaw.com
cbrinson@smithlaw.com
aries@smithlaw.com

Counsel for Defendant Dynax Corporation

By: /s/ Steven D. Weber
Steven D. Weber
PARKER POE ADAMS & BERNSTEIN
LLP
620 South Tryon Street, Suite 800
Charlotte, North Carolina 28202
Telephone: (704) 372-9000
steveweber@parkerpoe.com

Melanie Black Dubis
Charles Raynal
PARKER POE ADAMS & BERNSTEIN
LLP
301 Fayetteville Street, Suite 1400
Raleigh, North Carolina 27601

Telephone: (919) 828-0564
melaniedubis@parkerpoe.com
charlesraynal@parkerpoe.com

Robert H. Jordan, Esq.
PARKER POE ADAMS & BERNSTEIN
LLP
200 Meeting Street, Suite 301
Charleston, South Carolina 29401
Phone: 843-727-2650
robertjordan@parkerpoe.com

*Counsel for Defendant Clariant
Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2023, I electronically filed the foregoing document with the Clerk of the Court through the CM/ECF system, and that a true and correct copy of the foregoing document is being served to all known counsel of record by notice of electronic filing.

/s/ Addie K. S. Ries
Addie K. S. Ries